

TRYON, HELLER & RAYES, P.C.
ATTORNEYS AT LAW

6611 North Scottsdale Road
El Dorado Square - Gibraltar Building
Scottsdale, Arizona 85250-4421

MICHAEL G. GAUGHAN
DAVID M. HELLER
DOUGLAS L. RAYES
G. MICHAEL TRYON

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 29 10 30 AM '96
(602) 948-0355
FAX (602) 948-2298

July 23, 1996

Federal Election Commission
General Counsel's Office
Washington D.C. 20463

Re: Paul and Debra LaPrade
MUR-4389

Dear General Counsel's Office:

As you are aware from my previous letter of July 10, 1996 and the Statements of Designation of Counsel, this law firm represents Paul and Debra LaPrade reference the Complaint filed in MUR-4389 with the Federal Election Commission by Michael Schroeder. Please consider this letter the response by Mr. and Mrs. LaPrade to the Complaint filed in MUR-4389 regarding their donation to the Orange County Democratic Party.

By way of background, Paul and Debra LaPrade are husband and wife. The LaPrades and their four children reside in Phoenix, Arizona and maintain a second home in southern California. Paul LaPrade is a medical doctor specializing in neurosurgery. Debra LaPrade's brother, James Prince, was a candidate for the 1996 Democratic nomination in California's 46th Congressional District. That primary occurred on March 26, 1996 and Mr. Prince was unsuccessful in that election.

It is important to note that prior to the 1996 primary, Dr. LaPrade and his wife Debra had no experience or expertise with federal election laws. Specifically, their campaign donations, as set forth below, were based entirely upon assurances by third parties allegedly familiar with federal election laws that the donations were appropriate and in full compliance with any applicable regulation.

In approximately June, 1995, Debra and Paul LaPrade each contributed \$1,000 to the 1996 primary election campaign of James Prince for California's 46th Congressional District. Additionally, Debra and Paul each contributed \$1,000 toward the 1996 general election campaign of Mr. Prince. The LaPrades were informed that the amounts of their donations complied with federal election laws and that their donations toward the general election would be refunded if Mr. Prince was unsuccessful in the primary election.

In February, 1996, Debra called the Orange County, California Democratic party and spoke with James Toledano. Mr. Toledano identified himself as the Orange County Democratic party chairman and as an attorney. Debra advised Mr. Toledano that she and her husband wanted to make contributions to the Orange County Democratic party for voter awareness. She was told by Mr. Toledano that

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ATTORNEYS AT LAW

Federal Election Commission
General Counsel's Office
Page Two
July 23, 1996

she and her husband could each contribute up to \$5,000 to the Democratic party.

Thereafter, on or about February 20, 1996, a check in the amount of \$10,000 was delivered to the Orange County Democratic party on behalf of Debra and Paul LaPrade. A copy of that check is attached hereto. The LaPrades did not earmark their \$5,000 party contributions for any specific candidate. The LaPrades placed no conditions on the use of their donations by the Democratic party. Debra LaPrade was led to believe that the Democratic party would decide how to effectively utilize their party donations and she therefore left that matter to the good judgment of the Democratic party and its party chairman.

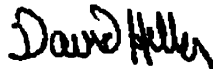
Debra LaPrade was informed by Mr. Toledano that \$5,000 party donations made by herself and her husband would be in compliance with the federal election laws and contribution limits. Once again, the LaPrades' party donations were not earmarked or conditioned for helping any particular candidate.

Based on the above, it is requested that the Commission find that Debra and Paul LaPrade did not violate the Federal Election Commission Act and that no action should be taken against the LaPrades in this matter.

Please be advised that the LaPrades desire to continue to cooperate with the Commission in this matter. Therefore, if you are in need of any additional information or documentation, please do not hesitate to call me.

I look forward to hearing from you.

Sincerely,



David M. Heller

DMH/dms
Enclosure

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SECTION 1

THE 1988 ELECTIONS
(Contributions from Individuals/
Persons Other Than Political Committees)

See separate schedule, page 1 of
-or other copy of the 3
Detailed Summary Page FOR LINE 1000
11(a)(1)

Any information required both with 2 above and 3 above may not be used as such by any person
for the purpose of collecting contributions or for commercial purposes, other than using the
name and address of any political committee to solicit contributions from on a non-reciprocal basis.

NAME OF DONOR (in full)

TRADE TAX CREDIT

CONTRIBUTOR

CONTRIBUTION OVER \$200

Full Name, mailing address and ZIP Code Electoral Type	Year of Receipt Receipting Aggregate Year-to-date	Date (month, day, year)	Amount of Each Receipt This Period
Laforda, William Lee 4734 E. Carson Dr Pasadena Valley, AZ 85213 Receipt For: Primary Receipt For: General	Paul Laforda, SR None Aggregate Year-to-date	\$2,100.00 06-21-95 06-27-95	1,000.00 1,000.00
Laforda, Matthew Ryan 4734 E. Carson Dr Pasadena Valley, AZ 85213 Receipt For: Primary Receipt For: General	n/a Student Aggregate Year-to-date	\$2,000.00 06-26-95 06-26-95	1,000.00 1,000.00
Laforda, William James 4734 E. Carson Dr Pasadena Valley, AZ 85213 Receipt For: Primary Receipt For: General	n/a Student Aggregate Year-to-date	\$2,000.00 06-26-95 06-26-95	1,000.00 1,000.00
Laforda, Paul M 4734 Carson Dr Pasadena Valley, AZ 85213 Receipt For: Primary Receipt For: General	Southwest Veterinary Dentist Aggregate Year-to-date	\$2,000.00 06-21-95 06-26-95	1,000.00 1,000.00
McTigue, John 627 C St. SE Washington, DC Receipt For: Primary	Ray Charles Brown Studio Administrative Staff Aggregate Year-to-date	\$400.00 06-16-95	400.00 In Kind
Myers, Jerry 221 E Broadway Santa Ana, CA 92701 Receipt For: Primary	Continuum Realty Owner/Co-Owner Aggregate Year-to-date	\$1,000.00 06-20-95	1,000.00

Sum of Receipts This Page (Optional)..... 28,400.00

TOTAL This Period (last page this line must equal).....

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SCHEDULE A

THE 1990 RECEIPTS
(Contributions from Individuals)
Persons Other Than Political Committees

See separate schedule(s) **PAGE 2** OF
for each category of 1 a 2 6
Total Summary Page FOR LINE 10000
11(a) ()

(Any information copied from such Reports and Statements may not be used or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.)

NAME OF CONTRIBUTOR (as Full)

Address for Congress

CONTRIBUTOR

Contributors Over \$200

Full Name, No. 11111 Address and ZIP Code Residence Type	Name of Employer Occupation Appropriate Year-to-date	Rev. (month, day, year.	Amount of Each Receipt This Period
Contributor: Cohen, Joan E Receipt For: General	Officer E.	06-30-95	1,000.00
Cohen, Jenny L 600 S Congress Ave. 8291 Kubota, CA 95750 Receipt For: Primary Receipt For: General	Self-Employed Director Appropriate Year-to-date	\$7,670.00 06-28-95 06-28-95	1,000.00 1,000.00
Cohen, Leonard 11116 Lundy Dr Vac Fullerton, CA 92732 Receipt For: Primary Receipt For: General	n/a Retired Appropriate Year-to-date	\$2,000.00 06-21-95 06-30-95	1,000.00 1,000.00
Curran, Thomas L 1104 S Milling Ct Fullerton, CA 92631 Receipt For: Primary	n/a Retired Appropriate Year-to-date	\$250.00 06-22-95	250.00
Frank, William 4700 Alameda St, NW Washington, DC 20016 Receipt For: Primary	Arnold and Porter Attorney Appropriate Year-to-date	\$300.00 06-30-95	300.00
Kosman, Barbara 1111 S Clark Dr Beverly Hills, CA 90211 Receipt For: Primary	Barbara Kosman Artist Appropriate Year-to-date	\$250.00 06-11-95	250.00
LaPrade, Brandon Joseph 4711 S Curran Dr Pasadena Valley, AZ 86213 Receipt For: Primary Receipt For: General	n/a Student Appropriate Year-to-date	\$2,000.00 06-30-95 06-30-95	1,000.00 1,000.00

Amount of Receipts This Page (Optional):

TOTAL This Period (last page this line number only):

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CREDITLY BANK 030696

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Democratic Party
Orange Co II

1181-2-08

T1 - Next Item

T2 - Logout

Next Action: Next Item

Press Return for J. Richman

Unique ID:

02573893045

DEBRA LEE LAPRADE
PAUL W LAPRADE

1181

20 19 96

20 19 96

Payable to the Order of
Democratic Party of Orange County
Ten Thousand and 00/100

Dollars

Pay to the Order of

Security

Investment

United Mutual Bank

Worren, Missouri

Other Services Account

Paul W Laprade